

PERSONAL DATA PROTECTION CHARTER FOR THE CUSTOMERS AND/OR PUPILS OF THE E.S.F.

In the framework of the services that it proposes, the E.S.F. is required to collect your personal data.

This charter describes how the E.S.F. may use these data, in accordance with the provisions of the GDPR (**General Data Protection Regulation of 25 May 2018**).

1. DID YOU KNOW?

E.S.F. instructors all work in a **freelance** capacity.

They form local groupings in their respective E.S.F. ski schools for organising teaching, supervision and activities involving skiing and other snow sports at the resorts.

For ensuring the defence of their interests they are also grouped together into **Syndicats Locaux** ("Local Trade Unions") which are legal entities. There is one *Syndicat Local* ("Local Trade Union") per resort.

The designation "**Ecole du Ski Français**" ("French Ski School") is authorised by the **Syndicat National des Moniteurs du Ski Français** (S.N.M.S.F. - "National Union of French Ski Instructors"), founded in 1945. The latter's objective is to organise the profession by ensuring that instructors enjoy autonomy in their organisation and teaching.

When you are a recipient of E.S.F. services, your personal data are therefore processed both by the *Syndicat Local* and by the S.N.M.S.F., each acting as a **processing manager** pursuing its own ends.

In other words:

- The *Syndicat Local* processes your data for managing its contractual relations with you (invoicing, payment, bookings management, etc.), for the purpose of conducting marketing operations and to comply with its legal obligations.
- The S.N.M.S.F. processes your data since it manages the central bookings IT system enabling the *Syndicats Locaux* to collect the data required for organising the E.S.F. services. The S.N.M.S.F. manages this IT system for the needs of CRM processing.

2. WHAT KINDS OF DATA ARE COLLECTED?

a. General case

Your personal data collected when you choose to register (online or at the ticket desk), with or without booking, are as follows:

- Surname
- Forename
- Gender
- Date of birth
- Proficiency level
- Language(s) spoken
- Postal address(es)
- Email address(es)
- Phone number(s)
- Address at the resort
- Bank account details

b. Photos or videos

Photos may be taken or video recordings made during lessons and competitions, for the purposes of E.S.F. promotion and communication. The consent of the pupils (or of their legal representative when they are minors) for broadcasting these images is obtained via a form.

c. "Star" test and E.S.F. competition results

If you have taken part in the "STAR" tests and/or E.S.F. competitions, your results shall be made public and posted on the premises of the *Syndicat Local* and online.

d. Banking data

The banking data transmitted when placing your order are not collected by the *Syndicat Local* or the S.N.M.S.F. Encryption technology is deployed by our service provider for securing your transactions.

3. FOR WHAT PURPOSES?

Your personal data are collected **for the exercise of E.S.F. activities**.
The data shall be kept (aggregated and anonymous) **for statistical purposes**.

Only data strictly required for the smooth running of the E.S.F. services and for the safeguarding of your vital interests shall be requested of you.

If a third party (cf. below) needs to use your personal data, we shall ensure that said party is capable of protecting the data.

We therefore pursue a **legitimate interest** in using your personal data, and this use does not impinge upon your liberty and your interests.

4. WHO ARE THE DATA RECIPIENTS?

To guarantee you a quality service, your data are intended for:

- the management team of the *Syndicat Local* of your resort;
- your E.S.F. instructor;
- the S.N.M.S.F. IT department;
- our IT (technical services) and web e-commerce development (sales analysis, CRM tools) subcontractors;
- the local authorities, if required by law.

5. DATA SECURITY

The information collected shall be saved in a secure computer file of the *Syndicat Local* and the S.N.M.S.F.

Appropriate measures shall be taken both technically (e.g., firewalls) and organisationally (e.g., login/password, physical means of protection, etc.) to protect your data from destruction, loss or misappropriation and unauthorised access, modification or disclosure, be these actions illicit or accidental.

6. YOUR RIGHTS

You have a right of opposition, access, rectification and deletion concerning your personal data.

To exercise your rights, simply contact the **Syndicat Local** by sending an email at resa@esf-villeneuve.com

7. DATA STORAGE TIME

The collected data are stored, archived then rendered anonymous by the *Syndicat Local* and the S.N.M.S.F.

Before being rendered anonymous, the personal data of customers / pupils shall be archived for **10 years from the booking date for accounting purposes** (since invoices must be kept for 10 years from the end of the financial year).

Before being archived, the data shall be saved for **3 consecutive seasons in the “active base”** of the *Syndicat Local* for canvassing purposes. At the end of the aforesaid period, the data shall be archived if you have not responded to any approach from the E.S.F.

8. COOKIES AND TAGS

a. Cookies

A cookie is a data file sent to your browser and saved on your terminal (e.g., computer, smartphone). This file contains information such as your domain name, your Internet service provider, your operating system and the dates and times of access.

If you visit its website, the *Syndicat Local* is liable to process the information concerning your activity on its site, such as the pages viewed and the searches conducted. This information is intended to improve the content of the site and your browsing experience.

You can configure your browser software to restrict the cookies that are saved on the terminal. This may in turn restrict your user experience on the site.

b. Tags

The *Syndicat Local* may occasionally use tags to assess how you respond to its website and the efficiency of its actions (e.g., number of times a page has been viewed).